TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 22, 2006

TO:

Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Priscilla Burton, CPSSc, Environmental Scientist/Soils, Team Lead PWB Ly and

RE:

Restart Preparation Plant, Savage Services Corporation, Savage Coal Terminal,

C/007/0022, Task ID #2599

SUMMARY:

Savage Services Corp. proposes to restart the preparation plant. Construction of four conveyors is the third step towards this goal and is the subject of this review. (The first step was the stacking tube addition, Task ID #2463. A second submittal currently under review is for the addition of settling ponds, Task ID #2524.) The four conveyors to be constructed are the Plant Feed Conveyor, Fine Raw Coal Conveyor, Clean Coal Stacking Conveyor and the Refuse Conveyor. All are described in detail in App. 3-8.

The information reviewed under Task ID #2549 was received on June 12, 2006. On July 12, 2006, the Division received a telephone request to expedite the approval allowing the concrete to be poured. On July 13, 2006, Pete Hess and I visited the site and found the excavation for the footers already completed and ready for concrete or, in one instance, already poured. The subsoil material was cast about in several piles and appeared to amount to 20 yd in all. We discussed the value of this material for use as berm around the proposed settling pond. Such use will be an abatement to the Notice of Violation N06-46-1-1 issued during the site visit for operating without an approved plan.

TECHNICAL ANALYSIS:

OPERATION PLAN

TOPSOIL AND SUBSOIL

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Analysis:

Topsoil Removal and Storage

The four conveyors to be constructed are the Plant Feed Conveyor BC-02, Fine Raw Coal Conveyor BC-03, Clean Coal Stacking Conveyor BC-05 and the Refuse Conveyor BC-04. All are described in detail in App. 3-8. Locations are shown on Dwg 0604-2-100. Specifications for bent foots are provided in Dwg. 0604-4-103 through 105. There will be 3 footers for BC-02 (Conveyor 1b), and 4 footers for conveyor BC-03 (conveyor 1d). A support column for the plant feed circuit will also be constructed (Dwg 0604-4-102). The radial stacker BC-05, conveyor #1c, requires no support footings.

The conveyors and concrete footers will be constructed in previously disturbed area. No plans for soil salvage were described. Since the reclamation plan for the site describes the lack of soil cover for the approximately 55 pre-law disturbance acres, there should be an attempt made to stockpile soil during the construction of the conveyor supports for use during construction of the settling ponds so that undisturbed soils are not used for construction.

As shown in App. 3-8, three to four footings will be excavated for each conveyor to a 7 ft. depth. Some of this earth will be replaced as compacted fill around the cement. But a 3 ft. depth of soil will be displaced by each cement pour, amounting to approximately 200 yd³in all. This recovered soil could be used as berm material around the settling ponds, allowing the maximum salvage of the undisturbed subsoil for stockpiling as substitute topsoil. Therefore, Notice of Violation N06-46-1-1 has requested that the available subsoil be used as berm material.

Findings:

The information provided meets the requirements of the regulations.

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

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Redistribution

Sections 8-6 and 8-8 through 8-10 describe soil redistribution and reclamation of in situ soils. Table 8-9 provides a mass-balance summary. There are 132.5 acres within the disturbed area. Of these, 55.3 are post-law. There are 44,617 yd stockpiled which will cover 83.79 acres to a depth of six inches.

Findings:

The information provided meets the requirements of the Regulations.

RECOMMENDATIONS:

The application is recommended for final approval.

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